

11/29/2022

Iowa Utilities Board  
1375 E. Court Avenue  
Des Moines, IA 50319

Dear Board Members:

Re: Docket No. HLP-2021-0003, Navigator Heartland Greenway, LLC

At a recent meeting on November 17, 2022, the Bremer County Nature Alliance (BCNA) board discussed the potential impacts of a carbon dioxide pipeline traversing Bremer County. Board members felt it important to send a written comment expressing our concern for certain species of birds, reptiles, and amphibians that may be impacted by the pipeline during construction. The pipeline is proposed to cross the Wapsipinicon and Cedar Rivers along with several other smaller tributaries. The manner of construction in the Wapsipinicon River floodplain in particular, may pose threats to 5 species that are state and/or federally listed as threatened or endangered. These species are known to exist within or not far from the proposed route. Conservation staff members have personally witnessed central newts, Blanding's turtles, massasauga rattlesnakes, red-shouldered hawks, and short eared owls in the Wapsipinicon River floodplain.

Central newts are listed as threatened in Iowa and are only present in 15 counties statewide. These amphibians need well vegetated woodland ponds and riverside pools to survive. Their survival is also impacted by human disturbance and deforestation.

Red-shouldered hawks, also state listed as endangered, need even aged large tracts of flood plain forest to successfully nest. Fragmenting these forests with cleared roads or other wide-open pathways, creates a habitat welcoming to other larger birds that will outcompete these hawks.

Massasauga rattlesnakes are state listed as endangered and federally listed as threatened. Over the years, research projects have been conducted on this species in Bremer County. The proposed Wapsipinicon River crossing is within the snake's travel range of where the research was conducted. Another research project is planned for 2023 to better compare population findings from past projects.

A critical role of the BCNA is to advocate for and support the Bremer County Conservation Board and the Iowa DNR, which own thousands of acres along the Wapsipinicon River, the tract the pipeline is proposed to cross is privately owned. Public or private, where and how the pipeline crosses the Wapsipinicon River, may pose a threat to critical habitat for certain species that are already showing population concerns. If projects, like the proposed pipeline, have a negative impact on the local habitat, it could further fragment the habitat needed for the survival of these endangered species.

The BCNA has also expressed concern for the safety of the residents near the proposed route and EMS personnel, in case of a leak or explosion.

The BCNA Board is respectfully requesting horizontally boring where the pipeline passes through river and stream corridors. By doing this, the amount of habitat damaged and fragmented will be reduced. This will also reduce the chances of unintentionally killing any of the species previously discussed.

Please consider construction practices that will diminish damage to critical habitats for these threatened and endangered species.

Sincerely,

A black rectangular redaction box covering the signature of Mike Stevens.

Mike Stevens

President, Bremer County Nature Alliance Board

Mike Stevens  
1309 Country Meadows  
Waverly, IA 50677

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